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By Federal Express

June 22, 1999

Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
U.S. Food and Drug Administration  
-200 c St. SW  
Washington, DC 20204

RE: Notification for Certain Types of Statements on Dietary Supplements.

Dear Sir or Madam:

As required by Section 403 (r)(6)(c) of the Food, Drug and Cosmetic Act, Pharmanex Inc., 2000 Sierra Point Parkway, Brisbane, California 94005, intends to market a dietary supplement product with the following labeling statements of nutritional support:

Product identified as **Cartilage Formula** with the following labeling statements:

- *Promotes normal healthy joint and cartilage function.*
- *Provides significant amounts of other important joint and cartilage nutrients.*
- *Glucosamine is a nutritional building block for the structural components (glycosaminoglycans) of joints and cartilage.*
- *Glucosamine helps maintain normal structure and function of healthy joints.*

I certify that the information contained in this notice is complete and accurate and that Pharmanex, Inc. has substantiation that these statements are truthful and not misleading.

Sincerely,

Carsten Smidt  
Director of Nutrition Research

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